

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GAILYN HALL,

Plaintiff(s),

vs.

C. R. BARD, INC.; BARD PERIPHERAL
VASCULAR, INCORPORATED,

Defendant(s).

Case # 3:20cv-00313-LRH-CLB

**VERIFIED PETITION FOR
PERMISSION TO PRACTICE
IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED
TO THE BAR OF THIS COURT
AND DESIGNATION OF
LOCAL COUNSEL**

FILING FEE IS \$250.00

Christopher J. Neumann, Petitioner, respectfully represents to the Court:
(name of petitioner)

1. That Petitioner is an attorney at law and a member of the law firm of

Greenberg Traurig, LLP

(firm name)

with offices at 1144 15th Street, Suite 3300,
(street address)

Denver,

(city)

Colorado,

(state)

80202,

(zip code)

303-572-6500,

(area code + telephone number)

neumannc@gtlaw.com.

(Email address)

2. That Petitioner has been retained personally or as a member of the law firm by

C. R. Bard, Inc., Bard Peripheral Vascular, Inc. to provide legal representation in connection with
[client(s)]

the above-entitled case now pending before this Court.

3. That since 10/30/1998, Petitioner has been and presently is a
 (date)
 member in good standing of the bar of the highest Court of the State of Colorado
 (state)
 where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or
 from the clerk of the supreme court or highest admitting court of each state, territory, or insular
 possession of the United States in which the applicant has been admitted to practice law certifying
 the applicant's membership therein is in good standing. See Exhibit A

4. That Petitioner was admitted to practice before the following United States District
 Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts
 of other States on the dates indicated for each, and that Petitioner is presently a member in good
 standing of the bars of said Courts.

Court	Date Admitted	Bar Number
U.S. District Court for the District of Colorado	December 15, 1998	785900
U.S. District Court, District of Columbia	June 4, 2007	CO0044
U.S. Court of Appeals, Tenth Circuit	May 6, 1999	
U.S. Court of Appeals, Ninth Circuit	September 15, 2016	
U.S. Court of Appeals, Eighth Circuit	May 2002	
U.S. Court of Appeals, District of Columbia	May 2010	
State of Colorado	October 30, 1998	29831

5. That there are or have been no disciplinary proceedings instituted against petitioner,
 nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory
 or administrative body, or any resignation or termination in order to avoid disciplinary or
 disbarment proceedings, except as described in detail below:

None

6. That Petitioner has never been denied admission to the State Bar of Nevada. (Give particulars if ever denied admission):

None

7. That Petitioner is a member of good standing in the following Bar Associations.

American Bar Association
Colorado Bar Association

8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 11-2 (formerly LR IA 10-2) during the past three (3) years in the following matters: (State "none" if no applications.)

Date of Application	Cause	Title of Court Administrative Body or Arbitrator	Was Application Granted or Denied
See Exhibit B			
See Exhibit C			

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.



Petitioner's signature

STATE OF Colorado)
COUNTY OF Denver)

Christopher J. Neumann, Petitioner, being first duly sworn, deposes and says:

That the foregoing statements are true.



Petitioner's signature

Subscribed and sworn to before me this

 day of , .

See attached

Notary Public or Clerk of Court

**DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO
THE BAR OF THIS COURT AND CONSENT THERETO.**

Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner believes it to be in the best interests of the client(s) to designate Eric W. Swanis,
(name of local counsel)
Attorney at Law, member of the State of Nevada and previously admitted to practice before the above-entitled Court as associate resident counsel in this action. The address and email address of said designated Nevada counsel is:

Greenberg Traurig, LLP, 10845 Griffith Peak Drive, Suite 600,

(street address)

Las Vegas,
(city)

Nevada,
(state)

89135,
(zip code)

702-792-3773,
(area code + telephone number)

swanise@gtlaw.com,
(Email address)

By this designation the petitioner and undersigned party(ies) agree that this designation constitutes agreement and authorization for the designated resident admitted counsel to sign stipulations binding on all of us.

APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL

The undersigned party(ies) appoint(s) Eric W. Swanis as
(name of local counsel)
his/her/their Designated Resident Nevada Counsel in this case.

/s/ Greg A. Dadika

(party's signature)

Greg A. Dadika

(type or print party name, title)

(party's signature)

(type or print party name, title)

CONSENT OF DESIGNEE

The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

/s/ Eric W. Swanis

Designated Resident Nevada Counsel's signature

6840

Bar number

swanise@gtlaw.com

Email address

APPROVED:

DATED this 20th day of July, 2020.



LARRY R. HICKS

UNITED STATES DISTRICT JUDGE

Subscribed, signed and sworn to (or affirmed) before me in the county of Denver
_____, State of Colorado, this 15th day of July, 2020,
by Christopher J. Neumann (name(s) of individual(s) making statement).

STAMP

Gina Spruitenburg
Gina Arlene Spruitenburg

Title of Office: Notary Public

My Commission Expires: July 26, 2023

GINA ARLENE SPRUITENBURG
NOTARY PUBLIC - STATE OF COLORADO
NOTARY ID 20194028313
MY COMMISSION EXPIRES JUL 26, 2023

EXHIBIT A



Certificate of Good Standing and No Disciplinary History

United States District Court
District of Colorado

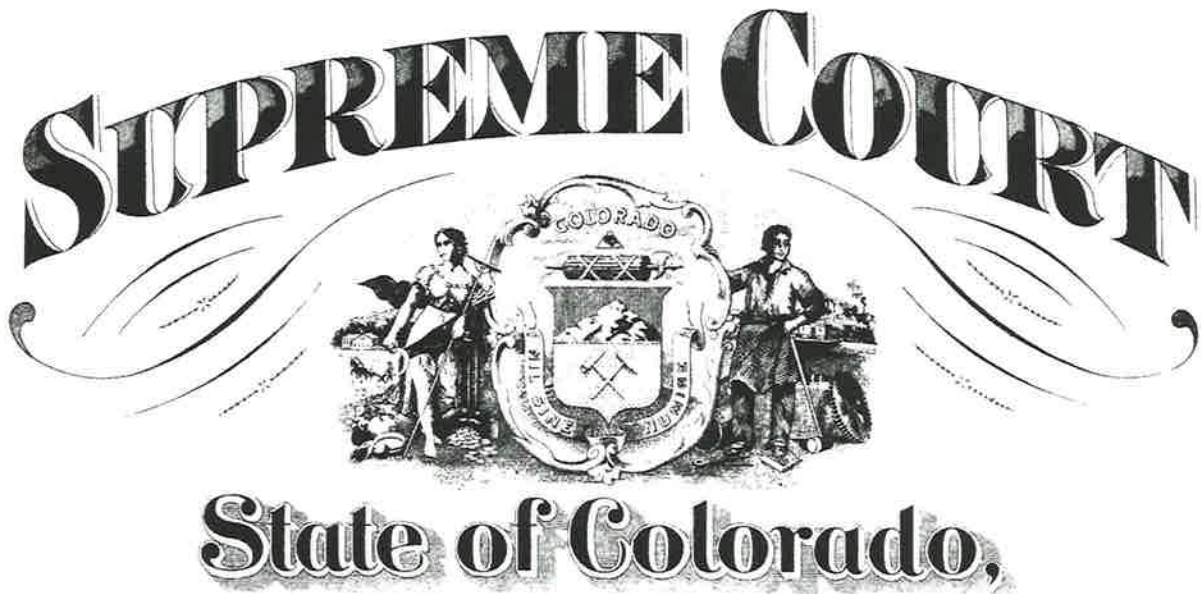
I, Jeffrey P. Colwell, Clerk of the United States District Court
DO HEREBY CERTIFY

CHRISTOPHER J NEUMANN

was admitted to practice in this court on
December 15, 1998
and is in good standing with no disciplinary history.

Dated: June 17, 2020

Jeffrey P. Colwell, Clerk



STATE OF COLORADO, ss:

I, Cheryl Stevens Clerk of the Supreme Court of the State of Colorado, do hereby certify that

CHRISTOPHER JOHN NEUMANN

has been duly licensed and admitted to practice as an

ATTORNEY AND COUNSELOR AT LAW

within this State; and that his/her name appears upon the Roll of Attorneys and Counselors at Law in my office of date the 30th

day of October A. D. 1998 and that at the date hereof the said CHRISTOPHER JOHN NEUMANN

is in good standing at this Bar.



IN WITNESS WHEREOF, I have hereunto subscribed my name and affixed the Seal of said Supreme Court, at Denver, in said State, this

17th

June

2020

day of

A. D.

Cheryl Stevens

Clerk

By

Deputy Clerk

**United States District & Bankruptcy Courts
for the District of Columbia
CLERK'S OFFICE
333 Constitution Avenue, NW
Washington, DC 20001**

I, **ANGELA D. CAESAR**, Clerk of the United States District Court
for the District of Columbia, do hereby certify that:

CHRISTOPHER NEUMANN

was, on the 4th day of June A.D. 2007 admitted to
practice as an Attorney at Law at the Bar of this Court, and is, according to
the records of this Court, a member of said Bar in good standing.

In Testimony Whereof, I hereunto subscribe my name and affix the seal of
said Court in the City of Washington this 23rd day of June
A.D. 2020.



ANGELA D. CAESAR, CLERK

By: *Tanisha Jefferson*
Deputy Clerk

EXHIBIT B

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEVADA
Christopher J. Neumann's Filed Petitions for Permission to Practice
in This Case Only by Attorney Not Admitted to the Bar of This Court

CASE NAME/STATUS	CASE #	DATE FILED/GRANTED [DKT. NO.]
Cardona v. C. R. Bard, Inc., et al./ Dismissed	2:19-cv-01573-KJD-BNW	Filed 10/4/19 [12]; Granted 10/7/19 [13]
Freeman v. C. R. Bard, Inc., et al.	2:19-cv-01572-RFB-BNW	Filed 10/4/19 [12]; Granted 10/9/19 [13]
Gita v. C. R. Bard, Inc., et al.	3:20-cv-00252-MMD-BNW	
Hrnciar v. C. R. Bard, Inc., et al.	2:19-cv-01872-RFB-BNW	Filed 11/20/19 [11]; Granted 11/21/19 [12]
Johnston v. C. R. Bard, Inc., et al.	3:20-cv-00069-MMD-BNW	Filed 11/20/19 [16]; Granted 11/21/19 [17]
Orgill v. C. R. Bard, Inc., et al.	2:19-cv-01882-RFB-BNW	Filed 11/20/19 [12]; Granted 11/21/19 [13]
Scholer v. C. R. Bard, Inc., et al./ Dismissed	2:19-cv-01568-KJD-BNW	Filed 10/4/19 [15]; Granted 10/16/19 [16]
Sekuler v. C. R. Bard, Inc., et al.	2:19-cv-01568-KJD-BNW	Filed 10/4/19 [13]; Granted 10/22/19 [16]
Spilotro/Duenas v. C. R. Bard, Inc.	2:19-cv-01586-KJD-BNW	Filed 10/3/19 [11]; Granted 10/7/19 [14]
Tilden v. C. R. Bard, Inc., et al./ Dismissed	2:19-cv-01571-JAD-DJA	Filed 10/4/19 [19]; Granted 10/7/19 [20]
Vanbiber v. C. R. Bard, Inc., et al.	2:19-cv-01884-KJD-BNW	Filed 11/20/19 [10]; Granted 11/22/19 [11]
Womack v. C.R. Bard, Inc., et al.	2:19-cv-01881-JCM-BNW	Filed: 11/20/19 [10]; Granted 1/22/19 [11]
Woods v. C. R. Bard, Inc., et al.	2:19-cv-01583-RFB-BNW	Filed 10/4/19 [13]; Granted 10/9/19 [14]
Buran v. C. R. Bard, Inc., et al.	2:20-cv-00608-GMN-BNW	Filed 07/15/20
Custer v. C. R. Bard, Inc., et al.	3:20-cv-00302-MMD-BNW	Filed 07/16/20
Hall v. C. R. Bard, Inc., et al.	3:20-cv-00313-LRH-CLB	Filed 07/16/20
Patchman v. C. R. Bard, Inc., et al.	2:20-cv-00599-KJD-BNW	Filed 07/16/20

EXHIBIT C

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

GAILYN HALL,

Plaintiff,

v.

C. R. BARD, INCORPORATED and BARD
PERIPHERAL VASCULAR,
INCORPORATED,

Defendants.

CASE NO.: 3:20-cv-00313-LRH-CLB

**AFFIDAVIT IN SUPPORT OF
VERIFIED PETITION FOR
PERMISSION TO PRACTICE IN THIS
CASE ONLY BY ATTORNEY NOT
ADMITTED TO THE BAR OF THIS
COURT AND DESIGNATION OF
LOCAL COUNSEL**

GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive
Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002

STATE OF COLORADO)

)

ss:

)

COUNTY OF DENVER)

I, CHRISTOPHER J. NEUMANN, being first duly sworn upon my oath, depose and state as follows:

1. I file this Affidavit pursuant to Local Rule IA 11-2(f)(2). I am a shareholder with the law firm of Greenberg Traurig, LLP ("GT"). GT was retained by Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Defendants" or "Bard") to provide them legal representation for the many cases remanded to this District, and hundreds of others remanded in other states, from the Multi-District Litigation proceeding styled *In re: Bard IVC Filter Litigation*, No. 2:15-MD-02641-DGC, pending before Senior Judge David Campbell of the District of Arizona (the "MDL").

1 To date, there have been two rounds of remands from the District of Arizona MDL to
2 the District of Nevada. In the first round of remands on August 20, 2019, fourteen (14) cases
3 were remanded to this District. In the second round of remands on October 17, 2019, ten (10)
4 cases were remanded to this District. In the third round of remands on March 20, 2020,
5 thirteen (13) cases were remanded to this District. The above-captioned case was in the third
6 round of remands to this District. *See Second Amended Suggestion of Remand and Transfer*
7 *Order* (Third) (Dkt. 5.) More remands are expected in the future.

8 2. I am a member in good standing of the State Bar of Colorado, where I regularly
9 practice law. I am also admitted to practice before the United States District Courts for the
10 District of Colorado and the District of Columbia, and several U.S. Circuit Courts of Appeal.
11 *See Verified Petition*, No. 4.

12 3. I am co-counsel in this action and several of the other MDL remands to this
13 Court with Eric W. Swanis, who is a member of the State Bar of Nevada and a GT shareholder
14 who resides and practices law in Nevada.

15 4. Due to the number and timing of the MDL remands to this Court, I have filed
16 numerous applications to practice *pro hac vice* before this Court under Local Rule IA 11-2.
17 I have identified all actions in which I have filed *pro hac vice* applications to appear as counsel
18 during the past three years. *See Verified Petition*, Exhibit B. All these actions are remands
19 from the MDL.

20 5. My firm has extensive experience in medical device products liability actions
21 and represents Bard in remands of IVC filter litigation across the country. I also have had
22 extensive interactions with client representatives concerning the facts underlying this matter
23 and am familiar with the facts and client-specific legal strategies pertinent to this litigation.


24 6. The granting of my Verified Petition serves the ends of justice by ensuring that
25 the interests of Bard are thoroughly represented by the persons most knowledgeable about the
26 litigation.

27 7. I therefore submit this Affidavit to establish special circumstances and good
28 cause to permit Bard to be defended in this matter by its counsel of choice. In my judgment,
Bard would be deprived of these benefits if I were unable to represent it in this litigation.

8. For all foregoing reasons, there are special circumstances and good cause that warrant the granting of my Verified Petition.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

DATED this 15 day of July 2020.


CHRISTOPHER J. NEUMANN, ESQ.

SUBSCRIBED AND SWORN to before me this

_____ day of _____, 2020.

See attached

Notary Public or Clerk of Court

Subscribed, signed and sworn to (or affirmed) before me in the county of Denver
_____, State of Colorado, this 15th day of July, 2020,
by Christopher J. Neumann (name(s) of individual(s) making statement).

Gina Spruitenburg
Gina Arlene Spruitenburg

Title of Office: Notary Public

My Commission Expires: July 26, 2023

STAMP

